

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ADVANCED ACCESS CONTENT SYSTEM
LICENSING ADMINISTRATOR, LLC,

Plaintiff,

v.

LANNY SHEN d/b/a DVDFAB AND
FENGTAO SOFTWARE INC., SUNREG
TECHNOLOGIES LTD. d/b/a DVDFAB AND
FENGTAO SOFTWARE INC., FENG TAO
d/b/a DVDFAB AND FENGTAO SOFTWARE
INC., SHEN XINLAN d/b/a AUDIO-DVD
CREATOR, and JOHN DOE, JANE DOE and/or
XYZ COMPANY d/b/a DVDFAB, RIPPERBLU-
RAY.COM, DVDFABB.COM and
DVDFFFAB.COM,

Defendants.

Civil Action No.
14 Civ. 1112 (VSB)

**NOTICE OF MOTION TO
VACATE CLERK'S
DEFAULT**

PLEASE TAKE NOTICE that upon the Declaration of Feng Tao dated June 20, 2014, the Declaration of Nancy J. Mertzell dated June 20, 2014, and the accompanying Memorandum of Law, Defendant Feng Tao d/b/a Fengtao Software will move this Court, before the Honorable Vernon S. Broderick, on a date and time designated by the Court, for an order pursuant to Rule 55(c) of the Federal Rules of Civil Procedure vacating the Clerk's Certificate of Default entered March 18, 2014 (Docket #26), and granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that any opposition papers shall
be served upon Defendant Feng Tao no later than July 11, 2014.

Dated: New York, New York
June 20, 2014

**SCHOEMAN UPDIKE KAUFMAN
STERN & ASCHER LLP**

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